

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION

Civil Action No. 3:15-cv-07658

JUDGE MICHAEL A. SHIPP
JUDGE LOIS H. GOODMAN

THIS DOCUMENT RELATES TO:

16-cv-07321 (MAS)(LHG)
16-cv-07324 (MAS)(LHG)
16-cv-07494 (MAS)(LHG)
16-cv-07496 (MAS)(LHG)
16-cv-07497 (MAS)(LHG)
17-cv-06513 (MAS)(LHG)
17-cv-07636 (MAS)(LHG)
17-cv-12088 (MAS)(LHG)
18-cv-00089 (MAS)(LHG)
18-cv-00343 (MAS)(LHG)
18-cv-00383 (MAS)(LHG)
18-cv-00846 (MAS)(LHG)
18-cv-00893 (MAS)(LHG)
18-cv-01223 (MAS)(LHG)
18-cv-08595 (MAS)(LHG)
18-cv-08705 (MAS)(LHG)
18-cv-15286 (MAS)(LHG)
20-cv-07460 (MAS)(LHG)
20-cv-07462 (MAS)(LHG)

**ORDER GRANTING DEFENDANT'S
CONSOLIDATED MOTION TO SEAL**

Defendant in the above-captioned actions Valeant Pharmaceuticals International, Inc. ("Valeant"), having filed a Motion to Seal certain exhibits to its Brief in Support of its Motion for a Protective Order (3:15-cv-07658 Dkt. No. 699, "Brief"), Direct Action Plaintiffs' ("Plaintiffs") Opposition Brief to Valeant's Motion for a Protective Order (3:15-cv-07658, Dkt. No. 718, "Opposition Brief"), and Valeant's Reply Brief in Support of its Motion for a Protective Order (3:15-cv-07658 Dkt. No. 722, "Reply Brief"), the court-appointed Special Master in the

above-captioned action makes the following findings of fact and conclusions of law, pursuant to Local Rule 5.3(c):

1. The Special Master finds that there are Stipulations and Confidentiality Orders entered by the Court in these matters (“Confidentiality Orders”), which allow the Producing Party to use a confidentiality designation for, among other things, “any Discovery Material . . . if such party in good faith believes that such Discovery Material contains . . . commercially sensitive information that requires the protections in this Stipulation and Order.”

2. The Special Master further finds that Confidential documents as marked by Valeant and Confidential deposition testimony as marked by Plaintiffs contain confidential and sensitive information as defined by the Confidentiality Orders and were properly designated as such.

3. The Special Master agrees that the information sought to be sealed as contained in the Confidential documents and testimony is confidential and sensitive in nature as it reveals, among other things, commercially sensitive business information.

4. The Special Master further finds that revealing to the public sensitive and confidential information sought to be sealed would harm the Parties’ legitimate interests in protecting their business model, policies, and procedures.

5. Plaintiffs do not object to Valeant’s request to seal the Confidential documents. The Special Master is not aware of any other party or nonparty who opposes this motion.

6. Accordingly, the Special Master finds, under the considerations set forth in Local Civil Rule 5.3(c), that good cause exists to permanently seal the temporarily sealed Exhibits H and I attached to the Brief and Exhibits D, F, G, H, I, J, K, L, M, N, O, and P attached to the Opposition Brief.

7. Further, the Special Master finds, under the considerations set forth in Local Civil Rule 5.3(c), that good cause exists to permanently redact the temporarily redacted Brief, Opposition Brief, and Reply Brief. The Special Master therefore permits the Redacted Documents to remain redacted.

SO ORDERED.

Date: July 7, 2021

/s/ Dennis Cavanaugh
DENNIS M. CAVANAUGH
Special Master